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13 PARADISE HARBOR PLACE TRUST,

14 Plaintiff,

15 vs.

16 BANK OF AMERICA, N.A., a national  
17 association; and DOE individuals I through XX;  
18 and ROE Corporations I through XX,

19 Defendants.

20 Case No.: 2:22-cv-00313-JCM-EJY

21 **STIPULATION AND ORDER FOR  
22 EXTENSION OF TIME TO RESPOND TO  
23 COMPLAINT  
24 (SECOND REQUEST)**

25 Paradise Harbor Place Trust (**Trust**) and Bank of America, N.A. (**BANA**) stipulate that  
26 BANA shall have through **July 26, 2022**, to file its response to the Trust's complaint. The current  
27 deadline is **June**  
28 deadline is **July 27, 2022**.

29 The failure of BANA to previously file its response to the Trust's complaint is a result of  
30 excusable neglect since BANA and the Trust are seriously exploring settlement options following  
31 this court's order denying the Trust's motions for a temporary restraining order and injunctive relief.  
32 ECF No. 16. Good cause also exists to grant the requested extension so the parties can continue to  
33 explore settlement options. Settlement includes this matter as well as other related quiet title matters  
34 in both in this court and in the state district court.

35 This is the parties' second request for an extension of this deadline and is not intended to  
36 cause any delay or prejudice to any party. Rather, it is intended as a firm date for the parties to

1 either resolve their dispute or move forward with this matter. The parties do not, at this time, request  
2 the court's assistance in mediating this matter  
3 DATED this 27th day of June, 2022.

<p>4</p> <p><b>AKERMAN LLP</b></p> <p>5 <i>/s/ Scott R. Lachman</i></p> <p>6 MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215</p> <p>7 SCOTT R. LACHMAN, ESQ. Nevada Bar No. 12016</p> <p>8 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134</p> <p>9</p> <p>10 <i>Attorneys for Bank of America, N.A.</i></p>	<p><b>ROGER P. CROTEAU &amp; ASSOCIATES, LTD</b></p> <p>5 <i>/s/ Christopher L. Benner</i></p> <p>6 ROGER P. CROTEAU, ESQ. Nevada Bar No. 4958</p> <p>7 CHRISTOPHER L. BENNER, ESQ. Nevada Bar No. 8963</p> <p>8 2810 W. Charleston Boulevard, Suite 75 Las Vegas, NV 89102</p> <p>9</p> <p>10 <i>Attorneys for Paradise Harbor Place Trust</i></p>
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12 **IT IS SO ORDERED.**

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15 **UNITED STATES MAGISTRATE JUDGE**  
Case No.: 2:22-cv-00313-JCM-EJY

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17 **DATED: June 27, 2022**

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